

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA)
) No. 07 CR- 843-9
vs.) Judge Schenkier
)
ROBERT FREEMAN)
)

**MOTION TO MODIFY THE CONDITIONS OF THE DEFENDANT'S
PRE-TRIAL RELEASE**

NOW COMES PAUL E. PAPROCKI attorney for ROBERT FREEMAN and hereby moves this Honorable Court to modify the conditions of the defendant's pre-trial release. In support of said motion, the defendant states as follows:

1. That the defendant ROBERT FREEMAN has previously been granted pre-trial release.
2. That as a condition of his release he has been placed on electronic home monitoring and has resided with his fiancé Juanta Hall who is also his third party custodian.
3. That the defendant has been living at 6317 North Mozart in the city of Chicago in the Northern District of Illinois.
4. That both the defendant and Ms. Hall are desirous of changing the defendant's living arraignment.
5. That the defendant can live with his mother Helen Freeman, who resides at 500 East 77th Street in the city of Chicago.

WHEREFORE, PAUL E. PAPROCKI prays that this Honorable Court to grant his motion to modify the conditions of the pre-trial release of ROBERT FREEMAN and enter an order allowing the defendant to reside with his mother.

s/ Paul E. Paprocki

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